

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,<sup>1</sup>

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**DEBTOR'S STATEMENT REGARDING MOTION FOR  
PROTECTIVE ORDER AND TO LIMIT DISCOVERY REGARDING  
DEBTOR'S MOTION FOR ORDER APPROVING THE DISCLOSURE  
STATEMENT AND PLAN CONFIRMATION PROCEDURES**

USA Gymnastics, as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), submits its Statement regarding the *Motion For Protective Order And To Limit Discovery Regarding Debtor’s Motion For Order Approving The Disclosure Statement And Plan Confirmation Procedures* [Dkt. 1117] (the “**Motion for Protective Order**”) filed by the United States Olympic and Paralympic Committee (the “**USOPC**”).

According to the Propounding Counsel, the discovery at issue is relevant only to the “settlement election” under the proposed plan. The Committee and the insurance carriers have both objected to the terms of the “settlement election.” The Debtors’ position is that if the Court is going to allow discovery to proceed notwithstanding the positions that the parties have taken regarding the “settlement election,” that discovery should not delay this case. Delay will not facilitate a settlement. Accordingly, as the Court considers how to address the Protective Order Motion, USAG requests that it consider the alternatives that USOPC proposed in its Protective Order Motion or any other reasonable alternative that will limit the cost and delay of discovery.

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

Dated: June 15, 2020

Respectfully submitted,

**JENNER & BLOCK LLP**

By: /s/ Catherine Steege

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